

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA**

CYNTHIA PUSEY VIGDOR; ROBERT)
VIGDOR; VANESSA KROMBEEN;)
VASHITA KOKKIRALA; JESSICA)
HUCK; RICHARD SMITHSON; RONALD)
EASTER; and PROVIDENCE)
ANESTHESIOLOGY ASSOCIATES, P.A.)
on behalf of themselves and other similarly)
situated persons,)

Plaintiffs,)

v.)

UNITEDHEALTHCARE INSURANCE)
COMPANY; UNITEDHEALTHCARE OF)
NORTH CAROLINA, INC.; UMR, INC.;)
UNITEDHEALTH GROUP, INC.,)

Defendants.)

Case No. 3:21-cv-00517-MOC-DCK

**DECLARATION OF JANE STALINSKI
IN SUPPORT OF DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION TO REMAND**

I, Jane Stalinski, declare and state as follows:

I am a Senior Legal Services Specialist. I work on behalf of United Healthcare Services, Inc. and its affiliates, including UnitedHealthcare Insurance Company ("UHIC").

1. As part of my role, my job responsibilities include, but are not limited to, reviewing member benefit plans. In performing these duties, I am familiar with the benefit plans that United insures and/or administers. I regularly review member benefit plans using United's internal systems.

2. Using identifying information provided in the Complaint filed in the above-captioned matter, I accessed and reviewed the specific benefits plans insured and/or administered by United in which the Patient Plaintiffs were either participants or beneficiaries on the dates they allegedly received the services described in the Complaint.

3. Attached as Exhibit A are true and accurate copies of select pages of the Nevada Nanotech Systems, Inc. UnitedHealthcare Choice Plus Certificate of Coverage, dated January 1, 2020.

4. Attached as Exhibit B are true and accurate copies of select pages of the Insight Global UnitedHealthcare Choice Plus Certificate of Coverage, dated January 1, 2021.

5. Attached as Exhibit C are true and accurate copies of select pages of the Kronsys, Inc. UnitedHealthcare Choice Plus Certificate of Coverage, dated October 1, 2020.

6. Attached as Exhibit D are true and accurate copies of select pages of the Italtresse USA, Inc. UnitedHealthcare Choice Plus Certificate of Coverage, dated May 1, 2020.

7. Attached as Exhibit E are true and accurate copies of select pages of the Airo Mechanical UnitedHealthcare Choice Plus Certificate of Coverage, dated April 1, 2020.

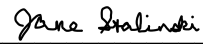
8. Attached as Exhibit F are true and accurate copies of select pages of the Sunbelt Furniture Xpress, Inc. UnitedHealthcare Choice Plus Certificate of Coverage, dated February 1, 2020.

9. Attached as Exhibit G is a chart prepared by United's outside counsel in the above-captioned matter based on information contained in the Complaint and information that I provided to them about the Patient Plaintiffs and the specific benefit plans insured and/or administered to them by United. Exhibit G identifies the initials of the six Patient Plaintiffs and

the names of their applicable plan sponsor or plan name, the United plan type, the plan effective date, and the relevant date of service. I have reviewed Exhibit G and believe it to be accurate.

I declare under penalty of perjury under the laws of the State of North Carolina that the foregoing is true and correct.

Executed on November 17, 2021 in Cleveland, Ohio.



Jane Stalinski

CERTIFICATE OF SERVICE

I certify that on November 22, 2021, I electronically filed the foregoing **DECLARATION OF JANE STALINSKI IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION TO REMAND** with the Clerk of Court using the CM/ECF system.

/s/ Matthew P. McGuire

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